

## **REMARKS**

Applicant has carefully reviewed and considered the Final Office Action mailed on May 9, 2005, and the references cited therewith.

Claims 1, 14-15, 22, 31, 38, and 42 are amended, and claims 16, 27-30, and 35 are canceled, no claims are added; as a result, claims 1-11, 13-15, 17-22, 24-26, 31-34, and 36-42 are now pending in this application.

### **§103 Rejection of the Claims**

Claims 1, 11-12, 14-17, 20, 22-23, 26-28, 31-33, 37-38, and 41-42 were rejected under 35 USC §103(a) as being unpatentable over Gandy et al. (U.S. Patent No. 5,376,957) in view of Ort (U.S. Patent No. 4,340,893). Applicant respectfully traverses the rejection as follows.

With regard to independent claims 1, 14, 22, 27, 31, 38 and 42 in the Final Office Action dated May 9, 2005, the Examiner cited the Gandy, et al., reference as differing from the presently claimed invention in that it does not disclose “first and second heating elements being maintained in face-to-face relation across said printzone”. The Examiner stated that the Ort reference describes “a heater on a carriage (figure 2, reference 46)” “where there is a first carriage holding a first heating element portion, a second carriage holding a second heating element portion, the heater portions being maintained in face-to-face opposition across the printzone”.

The Gandy reference appears to describe a pair of printheads in order to reproduce an image on both sides of a translucent substrate. (See Abstract). Gandy does not provide any description, teaching, or suggestion to locate a heating element on the pair, or even on one of the printheads, since a heating element is strictly shown and described as a stationary heat lamp (28 in Figures 1 and 2, 29 in Figure 3) across the entire width of the substrate.

The Ort reference appears to show a U-shaped apparatus with one aperture on each side of a printhead to provide a heated air supply to only one surface of print media. The Ort reference does not provide any description, teaching, or suggestion to provide a second carriage on an opposing side (backing surface) of the print media. Nor does the Ort reference provide any description, teaching, or suggestion for a second carriage on an opposing side (backing surface) to move in synchronous alignment with a first carriage.

In contrast, Applicant's independent claim 1, as amended recites;

a first carriage which scans an inkjet printhead across a print surface of print media, wherein the first carriage supports a first portion of a heating element . . .; and  
a second portion of the heating element carried by a second carriage across a backing surface of said print media, wherein the second portion of the heating element scans the backing surface of said print media in synchronous alignment to the first portion of the heating element.

Applicant respectfully submits that neither the Gandy nor the Ort reference illustrate each and every element and limitation of the Applicant's independent claim 1. Additionally, Ort does not describe, teach, or suggest any rationale for providing a second portion of a heating element carried by a second carriage across a backing surface of said print media in synchronous alignment to a first portion of the heating element. Gandy does not provide a description, teaching, or suggestion for placing a heating element on a printhead. Gandy illustrates a fixed heat lamp and appears only concerned with aligning printheads.

Moreover, even looking at Gandy and Ort together, the two references together do not provide a description, teaching, or suggestion that two portions of a heating element opposing different surfaces of print media should be scanned in synchronous alignment. Indeed, there would be no rationale for doing so since blowing heated air (as illustrated in Ort) and using a heat lamp (as illustrated in Gandy) do not involve relevant concern for alignment between a first portion and a second portion of a heating element opposing different surfaces. It is only due to the Applicant's particular use of microwave and/or RF radiant energy sources that the Applicant's claimed configuration becomes an issue or even relevant to consider.

Meyers, drawn to a "hot air impingement drying system", merely mentions a microwave and RF heaters, but does not provide a description of a first portion of a heating element scanned across a print surface, and a second heater element scanned across a backing surface. Meyer's Figure 3 illustrates fixed air blowers which are not even scanned much less scanned in synchronous alignment.

As such, Applicant believes that it is through the benefit of the Applicant's disclosure that such a motivation for the Applicant's claimed structure is provided. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the 103 rejection of independent claim 1, as amended, as well as for those claims which depend therefrom.

Additionally, Applicant's independent claims 14, 22, 31, 38, and 42, as amended, make it clear that the two heating elements are supported by two carriages, one of which also is supporting the printhead, and which are located on opposite sides of the print media where they scan in synchronous alignment on opposite sides of the print media. Independent claim 27 has been canceled.

For the reasons provided in connection with independent claim 1, Applicant respectfully submits that, while Ort may be used to illustrate placing a heated air drying element proximate to a printhead, neither Gandy nor Meyers offer a description, teaching, or suggestion as to the relevance for a first portion of a heating element scanned across a print surface, and a second heater element scanned across a backing surface in "alignment" as claimed in the independent claims.

As such, Applicant respectfully requests reconsideration of the language in each of these claims, as amended, and withdrawal of the 103 rejections for the same, as well as for those claims which depend therefrom.

Claims 2, 5, 8-10, 13, 19, 24-25, 29-30, 34-36, and 39-40 were rejected under 35 USC §103(a) as being unpatentable over Gandy et al.(U.S. Patent No. 5,376,957) in view of Ort (U.S. Patent No. 4,340,893), as applied to claims 1, 11, 14, 22, 27, 31, 38, and 42 above, and further in view of Meyers et al (U.S. Patent No. 6,463,674).

Claims 29-30, and 35 have been canceled.

For the reasons provided above, Applicant submits that independent claims 1, 14, 22, 31, and 38, from which all the above remaining claims depend, are in condition for allowance. From the Applicant's review of Meyers, the reference does not cure the deficiencies of the Gandy and Ort references. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the 103 rejection of the above remaining dependent claims.

Claims 3-4 were rejected under 35 USC §103(a) as being unpatentable over Gandy et al.(U.S. Patent No. 5,376,957) in view of Ort (U.S. Patent No. 4,340,893), and Meyers et al (U.S. Patent No. 6,463,674), as applied to claim 2, and further in view of Carreira et al (U.S. Patent No. 5,220,346).

Claims 3-4 depend indirectly from independent claim 1. For the reasons provided above, Applicant submits that independent claim 1, as amended, is in

condition for allowance. From the Applicant's review of the Carreira reference, the reference does not cure the deficiencies of the Gandy, Ort, and Meyers references. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the 103 rejection of dependent claims 3 and 4.

Claims 18 and 21 were rejected under 35 USC §103(a) as being unpatentable over Gandy et al.(U.S. Patent No. 5,376,957) in view of Ort (U.S. Patent No. 4,340,893), as applied to claim 14, and further in view of Carreira et al (U.S. Patent No. 5,220,346).

Claims 18 and 21 depend directly and indirectly from independent claim 14. For the reasons provided above, Applicant submits that independent claim 14, as amended, is distinguishable from the Gandy and Ort references. From the Applicant's review of the Carreira reference, the reference does not cure the deficiencies of the Gandy and Ort references. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the 103 rejection of dependent claims 18 and 21.

Claims 6-7 were rejected under 35 USC §103(a) as being unpatentable over Gandy et al.(U.S. Patent No. 5,376,957) in view of Ort (U.S. Patent No. 4,340,893), and Meyers et al (U.S. Patent No. 6,463,674), as applied to claim 5, and further in view of Woo et al (U.S. Patent No. 5,645,904).

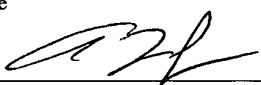
For the reasons provided above, Applicant submits that independent claim 1, from which claims 6 and 7 depend, is in condition for allowance. From the Applicant's review, the Woo reference does not cure the deficiencies of the Gandy, Ort, and Meyers references. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the 103 rejection of dependent claims 6 and 7.

Conclusion

Applicant respectfully submits that the claims are in condition for allowance and notification to that effect is earnestly requested. The Examiner is invited to telephone Applicant's attorney Gregg W. Wisdom at (360) 212-8052.

At any time during the pendency of this application, please charge any additional fees or credit overpayment to the Deposit Account No. 08-2025.

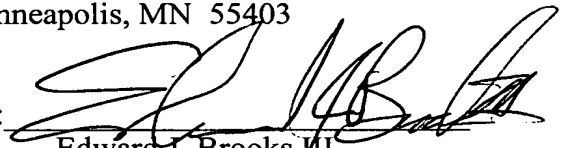
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